FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

OmniSource Corporation 1145 Fairview Ft. Wayne, Indiana 46803

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 003-12494-00057	
Issued by: Paul Dubenetzky, Branch Chief	Issuance Date:
Office of Air Quality	Expiration Date:

TABLE OF CONTENTS

SECTIO	N A	SOURCE SUMMARY
	A.1	General Information [326 IAC 2-8-3(b)]
	A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
	A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
	A.4	FESOP Applicability [326 IAC 2-8-2]
	A.5	Prior Permit Conditions
SECTIO	N B	GENERAL CONDITIONS 7
	B.1	Permit No Defense [IC 13]
	B.2	Definitions [326 IAC 2-8-1]
	B.3	Permit Term [326 IAC 2-8-4(2)]
	B.4	Enforceability [326 IAC 2-8-6]
	B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
	B.6	Severability [326 IAC 2-8-4(4)]
	B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
	B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
	B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]
	B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
	B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
	B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
	B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
	B.14	Emergency Provisions [326 IAC 2-8-12]
	B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
	B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination
		[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]
	B.17	Permit Renewal [326 IAC 2-8-3(h)]
	B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]
	B.19	Operational Flexibility [326 IAC 2-8-15]
	B.20	Permit Revision Requirement [326 IAC 2-8-11.1]
	B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IAC 13-14-2-2]
	B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]
	B.23	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]
SECTIO	N C	SOURCE OPERATION CONDITIONS
		ons Limitations and Standards [326 IAC 2-8-4(1)]
	C.1	Overall Source Limit [326 IAC 2-8]
	C.2	Opacity [326 IAC 5-1]
	C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]
	C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
	C.5	Fugitive Dust Emissions [326 IAC 6-4]
	C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]
	C.7	Stack Height [326 IAC 1-7]
	C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] [40 CFR 61, Subpart M]
	Testing	Requirements [326 IAC 2-8-4(3)]
	C.9	Performance Testing [326 IAC 3-6]
	-	ance Requirements [326 IAC 2-1.1-11]
	C.10	Compliance Requirements [326 IAC 2-1.1-11]

OmniSource Corporation	Page 3 of 38
Ft. Wayne, Indiana	FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG	

	C.11	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
	C.12	Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
	C.13	Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
		TABLE OF CONTENTS (Continued)
	C.14	Pressure Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]
	Correct	tive Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
	C.15	Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
	C.16	Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
	C.17	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
	C.18	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]
	Record C.19	Keeping and Reporting Requirements [326 IAC 2-8-4(3)] Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
	C.19	General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
	C.21	General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]
	C.22	Compliance with 40 CFR 82 and 326 IAC 22-1
SECTIO	ON D.1	FACILITY OPERATION CONDITIONS
	Emission D.1.1	on Limitations and standards [326 IAC 2-8-4(1)] Particulate Matter (PM) [326 IAC 6-3-2]
		iance Determination Requirements Testing Requirements
	Compli D.1.3	iance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] Visible Emissions Notations
	Record D.1.4	Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16] Record Keeping Requirements
SECTIO	ON D.2	FACILITY OPERATION CONDITIONS
	Genera	uction Conditions Il Construction Conditions ve Date of the Permit
	Emissi	on Limitations and Standards
	D.2.4	Particulate Matter (PM) [326 IAC 6-3-2]
	D.2.5	\
	D.2.6 D.2.7	
	Compli	iance Determination Requirements
	D.2.8	Testing Requirements
	D.2.9	· ,
	D.2.10	Volatile Organic Compounds (VOC)
	Compli	ance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
	_	Visible Emissions Notations
		Cyclone Inspections

OmniSource Corporation Ft. Wayne, Indiana Permit Reviewer: ERG/DG Page 4 of 38 FESOP No. F003-12494-46808

- D.2.13 Cyclone Failure Detection
- D.2.14 Parametric Monitoring
- D.2.15 Metal Alloy Chip Oil Content
- D.2.16 Metal Alloy Chip Oil Volatile Organic Compound (VOC) Content

Page 5 of 38 FESOP No. F003-12494-46808

TABLE OF CONTENTS (Continued)

	ecord Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16] 2.17 Record Keeping Requirements
	2.18 Reporting Requirements
SECTION	D.3 FACILITY OPERATION CONDITIONS
En	nission Limitations and standards [326 IAC 2-8-4(1)]
D.:	3.1 Particulate Matter (PM) [326 IAC 6-3-2]
	ompliance Determination Requirements
D.:	3.2 Testing Requirements
Co	ompliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
D.:	3.3 Visible Emissions Notations
Re	ecord Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.:	3.4 Record Keeping Requirements
	on
	by Occurrence Report
	Deviation and Monitoring Report
LEOOL OF	uarterly Report

OmniSource Corporation Page 6 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a

Authorized individual: David T. Frebel

Source Address: 1145 Fairview, Ft. Wayne, Indiana 46803

Mailing Address: 1610 North Calhoun Street, Ft. Wayne, Indiana 46803

Phone Number: 219-422-5541 SIC Code: 5093 Source Location Status: Allen

County Status: Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, under PSD;

Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) aluminum sweat furnace (SF-1) with a maximum capacity of 1200 pounds per hour, consisting of:
 - (1) One (1) melt chamber (maximum heat input rate of 2.0 MMBtu/hr), and
 - One (1) holding chamber (maximum heat input rate of 2.0 MMBtu/hr), connected to an afterburner (maximum heat input rate of 2.0 MMBtu/hr), exhausting to stack SF-1.
- (b) One copper wire reclamation furnace (CF-1) with a maximum capacity of 200 pounds per hour and a maximum heat input rate of 2.5 MMBtu/hr, consisting of:
 - (1) Two (2) primary chambers,
 - (2) One(1) auxiliary burner, and
 - (3) Two (2) afterburners connected to a baghouse and HEPA filter, exhausting to stack CF-1.
- (c) One (1) metal alloy chip recycling process line with a maximum feed rate of 6,000 pounds of chips per hour, consisting of the following facilities:
 - (1) One (1) chip crusher controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1.
 - One (1) natural gas-fired rotary dryer (0.6 MMBtu/hr) controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1.

- (3) One (1) magnet-separator.
- (4) One (1) non-ferrous metal chip separating line controlled by a baghouse (CE-3).
- (5) One (1) ferrous metal chip separating line controlled by a baghouse (CE-3).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

Page 8 of 38 FESOP No. F003-12494-46808

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not effect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit, or for information claimed to the confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]

claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Permit Reviewer: ERG/DG

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

OmniSource Corporation Page 10 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes

or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)

or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent either by mail or facsimile, to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

OmniSource Corporation Page 13 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source,

Permit Reviewer: ERG/DG

except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

 If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]

OmniSource Corporation Page 16 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, any records that must be kept under the conditions of this permit;
- (c) Inspect, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

Page 18 of 38 FESOP No. F003-12494-46808

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e) and (f), and 326 IAC 1-7-5 (d) are not federally enforceable.

- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] [40 CFR 61, Subpart M]
 - (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
 - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
 - (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

OmniSource Corporation Page 20 of 38 Ft. Wayne, Indiana FESOP No. F003-12494-46808

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
applicable for any removal or disturbance of RACM greater than three (3) linear feet on
pipes or three (3) square feet on any other facility components or a total of at least 0.75
cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
thoroughly inspect the affected portion of the facility for the presence of asbestos. The
requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

Permit Reviewer: ERG/DG

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee

OmniSource Corporation Page 21 of 38 Ft. Wayne, Indiana FESOP No. F003-12494-46808

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Permit Reviewer: ERG/DG

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

OmniSource Corporation Page 22 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

<u>C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]</u>

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

OmniSource Corporation Page 23 of 38 Ft. Wayne, Indiana FESOP No. F003-12494-46808

Permit Reviewer: ERG/DG

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
 - (1) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of

OmniSource Corporation Ft. Wayne, Indiana Permit Reviewer: ERG/DG Page 24 of 38 FESOP No. F003-12494-46808

the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken, must be reported. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) aluminum sweat furnace (SF-1) with a maximum capacity of 1200 pounds per hour, consisting of:
 - (1) One (1) melt chamber (maximum heat input rate of 2.0 MMBtu/hr), and
 - One (1) holding chamber (maximum heat input rate of 2.0 MMBtu/hr), connected to an afterburner (maximum heat input rate of 2.0 MMBtu/hr), exhausting to stack SF-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the aluminum sweat furnace shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.2 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.3 Visible Emissions Notations

- (a) Visible emission notations of the aluminum sweat furnace afterburner stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

OmniSource Corporation Page 27 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of daily visible emission notations of the sweat furnace afterburner stack exhaust.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Page 28 of 38 FESOP No. F003-12494-46808

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) metal alloy chip recycling process line with a maximum feed rate of 6,000 pounds of chips per hour, consisting of the following facilities:
 - (1) One (1) chip crusher controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1;
 - (2) One (1) natural gas-fired rotary dryer (0.6 MMBtu/hr) controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1;
 - (3) One (1) magnet separator.
 - (4) One (1) non-ferrous metal chip separating line controlled by a baghouse (CE-3).
 - (5) One (1) ferrous metal chip separating line controlled by a baghouse (CE-3).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Emission Limitations and Standards

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the metal chip crushing, drying, and separating facilities shall not exceed 8.56 pounds per hour when operating at a process weight rate of 6,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

P = process weight rate in tons per hour

D.2.5 Particulate Matter (PM and PM10) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the source shall limit PM10 emissions to 8.56 lb/hr. This will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions with a cyclone.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 8-1-6]

Pursuant to 326 IAC 2-8-4 (FESOP), the source shall limit VOC emissions to 3.60 lb/hr. This will limit VOC emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (PSD Rules) and 326 IAC 8-1-6 (VOC) not applicable. The source will be in compliance with this limitation by operating with a maximum chip throughput not to exceed 6,000 pounds per hour, a maximum chip oil content of 2 percent, and by controlling VOC emissions with an afterburner.

D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

Compliance Determination Requirements

D.2.8 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound (VOC) limit specified in Condition D.2.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.9 Particulate Matter (PM)

The metal chip crusher/dryer cyclone for PM control shall be in operation and control emissions from the metal chip crusher/dryer at all times that the metal chip crusher/dryer are in operation.

D.2.10 Volatile Organic Compounds (VOC)

The metal chip dryer afterburner for VOC control shall be in operation and control emissions from the metal chip dryer at all times that the metal chip dryer is in operation. When operating, the afterburner shall maintain a minimum operating temperature of 1400 degrees Fahrenheit or the minimum operating temperature determined by vendor specification or by compliance testing to maintain a minimum 97 percent destruction of VOC captured.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.11 Visible Emissions Notations

- (a) Visible emission notations of the cyclone and afterburner stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

OmniSource Corporation Page 30 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.12 Cyclone Inspections

An inspection shall be performed each calender quarter of the cyclone controlling the metal chip crushing/drying operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.2.13 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.14 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the metal chip dryer afterburner for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to 1400 degrees Fahrenheit, or the minimum operating temperature determined by vendor specification or by the most recent compliance stack test.
- (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is below the above mentioned temperature for any one reading. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.15 Metal Alloy Chip Oil Content

A determination of the oil content (percent by weight) of the metal alloy chips entering the chip dryer shall be performed on a monthly basis. The determination shall be either a certification from the chip supplier or a laboratory analysis of the metal chips.

D.2.16 Metal Alloy Chip Oil Volatile Organic Compound (VOC) Content

A determination of the VOC content of the oil (percent by weight) on the metal chips entering the chip dryer shall be performed on a monthly basis. The determination of the oil VOC content of shall be either a certification from the chip supplier or a laboratory analysis of the oil.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.17 Record Keeping Requirements

- (a) To document compliance with Condition D.2.11, the Permittee shall maintain records of once-per-shift visible emission notations of the metal chip crusher/dryer cyclone and afterburner stack exhaust.
- (b) To document compliance with Condition D.2.12, the Permittee shall maintain records of the results of the inspections required under Condition D.2.12 and the dates the vents are redirected.

Page 31 of 38 FESOP No. F003-12494-46808

- (c) To document compliance with Condition D.2.14, the Permittee shall maintain records of the burner temperature at the afterburner and the minimum operating temperature determined by vendor specification or by compliance testing.
- (d) To document compliance with Condition D.2.15, the Permittee shall maintain records of the results of the chip oil content determinations.
- (e) To document compliance with Condition D.2.16, the Permittee shall maintain records of the results of the oil VOC content determinations.
- (f) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.2.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) copper wire reclamation furnace (CF-1) with a maximum capacity of 200 pounds per hour and a maximum heat input rate of 2.5 MMBtu/hr, consisting of:
 - (1) Two (2) primary chambers.
 - (2) One(1) auxiliary burner.
 - (3) Two (2) afterburners connected to a baghouse and HEPA filter, exhausting to stack CF-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the copper wire reclamation furnace shall not exceed 0.88 pounds per hour when operating at a process weight rate of 200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.3 Visible Emissions Notations

- (a) Visible emission notations of the copper wire reclamation furnace afterburner stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

OmniSource Corporation Page 33 of 38
Ft. Wayne, Indiana FESOP No. F003-12494-46808
Permit Reviewer: ERG/DG

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of daily visible emission notations of the copper wire reclamation furnace afterburner stack exhaust.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

OmniSource Corporation Ft. Wayne, Indiana Permit Reviewer: ERG/DG Page 34 of 38 FESOP No. F003-12494-46808

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: OmniSource Corporation

Source Address: 1145 Fairview, Ft. Wayne, Indiana 46803

Mailing Address: 1610 North Calhoun Street, Ft. Wayne, Indiana 46808

FESOP No.: 003-12494-00056

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.	
Please check what document is being certified:	
9 Annual Compliance Certification Letter	
9 Test Result (specify)	
9 Report (specify)	
9 Notification (specify)	
9 Affidavit (specify)	
9 Other (specify)	
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
Signature:	
Printed Name:	
Title/Position:	
Date:	

OmniSource Corporation Ft. Wayne, Indiana Permit Reviewer: ERG/DG

Page 35 of 38 FESOP No. F003-12494-46808

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Office of Air Quality
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Fax: 317-233-5967

Source Name: OmniSource Corporation

Source Address: 1145 Fairview, Ft. Wayne, Indiana 46803

Mailing Address: 1610 North Calhoun Street, Ft. Wayne, Indiana 46808

FESOP No.: 003-12494-00056

This forn	n consists	of 2	pages
-----------	------------	------	-------

Page 1 of 2

Che	eck	either No. 1 or No.2
9	1.	This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2.	This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A Facility/Equipment/Operation: Control Equipment: Permit Condition or Operation Limitation in Permit: Description of the Emergency/Deviation: Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _X , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:
Form Completed by: Title / Position: Date: Phone:

A certification is not required for this report.

OmniSource Corporation Ft. Wayne, Indiana Permit Reviewer: ERG/DG

Source Name:

Page 37 of 38 FESOP No. F003-12494-46808

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY AIR COMPLIANCE BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION and MONITORING REPORT

OmniSource Corporation

Source Address: Mailing Address:		iew, Ft. Wayne, Ir n Calhoun Street,	ndiana 46803 Ft. Wayne, Indiana 4	6808
FESOP No.:	003-12494	-00056		
	Months:	to	Year:	
				Page 1 of 2
report shall be sub date(s) of each de- reported. Deviation according to the so	mitted quarterly viation, the probast that are required the character in t	based on a caler able cause of the red to be reported a the applicable reattached if necess	ndar year. Any deviation deviation, and the rest by an applicable requequirement and do no eary. If no deviations of	stated in this permit. This on from the requirements, the sponse steps taken must be uirement shall be reported t need to be included in this occurred, please specify in the
9 NO DEVIATION	S OCCURRED	THIS REPORTING	G PERIOD.	
9 THE FOLLOWIN	IG DEVIATIONS	OCCURRED TH	IIS REPORTING PER	IOD
Permit Requirem	ent (specify per	rmit condition #)		
Date of Deviation	:		Duration of Devia	tion:
Number of Deviat	ions:			
Probable Cause	of Deviation:			
Response Steps	Taken:			
Permit Requirem	ent (specify per	rmit condition #)		
Date of Deviation	:		Duration of Devia	tion:
Number of Deviat	ions:			
Probable Cause	of Deviation:			
Response Steps	Taken:			

Page 38 of 38 FESOP No. F003-12494-46808

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Form Completed By: Title/Position: Date: Phone:	

Attach a signed certification to complete this report.

OmniSource Corporation Ft. Wayne, Indiana Permit Reviewer: ERG/DG

Page 39 of 38 FESOP No. F003-12494-46808

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION**

	FESOF	Quarterly Report	
Source Name: Source Address: Mailing Address: FESOP No.: Facility: Parameter: Limit::	1610 North Calhoun 003-12494-00056 Metal alloy chip drye Oil content of metal Maximum 2 percent	ayne, Indiana 46803 Street, Ft. Wayne, Indiana 468 er alloy chips	08
Month	Column 1	Column 2	Column 1 + Column 2
Month	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
9	No deviation occurre Deviation/s occurred Deviation has been r	in this quarter.	
	/ Position:		

Attach a signed certification to complete this report.

Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit

Source Name: OmniSource Corporation

Source Location: 1145 Fairview, Ft. Wayne, Indiana 46803

County: Allen County

SIC Code: 5093

Operation Permit No.: F 003-12494-00057

Permit Reviewer: ERG/DG

On December 21, 2000, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that OmniSource Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary source that recovers non-ferrous metal chips from metal alloy chips. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Entire Document

As of January 1, 2001, the Office of Air Management is now known as the Office of Air Quality. The Permit and this Addendum have been updated to reflect the name change.

Responses to OmniSource Corporation Comments

On January 2, 2000, OmniSource submitted oral comments on the proposed FESOP permit. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

Comment 1: Requirement for Compliance Testing of Rotary Dryer Afterburner

As part of its formal review of the previously submitted FESOP application, OmniSource stated that they would rather analyze the incoming chips for volatile organic compound (VOC) instead of conducting a performance test of the rotary dryer afterburner to demonstrate compliance with the VOC emission limit.

Response to Comment 1:

The requirement to conduct a performance test of the rotary dryer afterburner has been removed from the permit and replaced with a requirement to determine the VOC content of the incoming metal chips. The VOC content, combined with the existing requirement to determine the oil content of the incoming metal chips, will be used by the facility to demonstrate compliance with the VOC limit in Condition D.2.6.

However, the requirement to monitor the operating temperature of the afterburner is necessary to ensure that a minimum VOC destruction efficiency of 97 percent is achieved. Consequently, this requirement will be retained. The permit has been revised to clarify that the minimum afterburner operating temperature is 1400 degrees Fahrenheit or the minimum operating temperature determined by vendor specification or compliance testing to maintain a minimum 97 percent destruction of VOC captured.

In the draft permit submitted to public notice, the minimum operating temperature was specified as 1500 degrees Fahrenheit. This temperature has been reduced to 1400 degrees Fahrenheit because this temperature is considered sufficient by IDEM to achieve 97 percent VOC destruction.

Since the draft permit contained a requirement to monitor the oil content of the incoming chips, the requirement to determine oil VOC content, in lieu of performance testing, was added to this existing requirement. An accompanying addition to the record keeping requirements was also made. Therefore, Conditions D.2.8, D.2.10, D.2.14, and D.2.16 will be changed as follows:

D.2.8 Testing Requirements

Compliance tests shall be performed for the afterburner for volatile organic compounds, including capture efficiency and destruction efficiencies, within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule as approved by the Commissioner. The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.10 Volatile Organic Compounds (VOC)

The metal chip dryer afterburner for VOC control shall be in operation and control emissions from the metal chip dryer at all times that the metal chip dryer is in operation. When operating, the afterburner shall maintain a minimum operating temperature of 14500 degrees Fahrenheit or the minimum operating temperature determined by vendor specification or by—in the—compliance testing to maintain a minimum 97 percent destruction of VOC captured.

D.2.14 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the metal chip dryer afterburner for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to 14500 degrees Fahrenheit, or the minimum operating temperature determined by vendor specification or by used to demonstrate compliance during the most recent compliance stack test.
- (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is below the above mentioned temperature for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.16 Metal Alloy Chip Oil Volatile Organic Compound (VOC) Content

A determination of the VOC content of the oil (percent by weight) on the metal chips entering the chip dryer shall be performed on a monthly basis. The determination of the oil VOC content of shall be either a certification from the chip supplier or a laboratory analysis of the oil.

D.2.176 Record Keeping Requirements

- (a) To document compliance with Condition D.2.11, the Permittee shall maintain records of once-per-shift visible emission notations of the metal chip crusher/dryer cyclone and afterburner stack exhaust.
- (b) To document compliance with Condition D.2.12, the Permittee shall maintain records of the results of the inspections required under Condition D.2.12 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.14, the Permittee shall maintain records of the burner temperature at the afterburner and the **minimum operating temperature**determined by vendor specification or by compliance testing temperature used to demonstrate compliance during the most recent compliance stack test.
- (d) To document compliance with Condition D.2.15, the Permittee shall maintain records of the results of the chip oil content determinations.
- (e) To document compliance with Condition D.2.16, the Permittee shall maintain records of the results of the oil VOC content determinations.
- (fe) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Comment 2: Monitoring of Metal Chip Oil Content

OmniSource commented that the requirement for monitoring of the oil content of the metal chips entering the chip dryer on a monthly basis was unnecessary and requested that the requirement be removed from the permit.

Response to Comment 2:

In light of the removal of the performance test requirement for the rotary chip dryer afterburner, the requirement to monitor the metal chip oil content will be retained in the permit. The oil content of the metal chips will be used by the facility, in conjunction with the oil VOC content determinations, to demonstrate compliance with the VOC limit in Condition D.2.6. No change was made as a result of this comment.

Comment 3: Parametric Monitoring of Afterburner Temperature

As part of their comments on the draft permit, OmniSource requested clarification as to the type of system that must be used to satisfy the requirements of continuous temperature monitoring.

Response to Comment 3:

The minimum requirements of the system for continuously monitoring afterburner temperature is a system that measures afterburner temperature at least once per hour and is equipped with a strip chart and a low-temperature alarm. No change was made as a result of this comment.

Additional Revisions made by IDEM:

Upon further review, IDEM has decided to make the following changes:

(See following pages)

Section D.1

 The parametric monitoring and associated record keeping requirements for the aluminum sweat furnace afterburner were removed. The equipment does not meet the applicability for compliance monitoring as outlined in IDEM's May 1996 Compliance Monitoring Guidance.

D.1.4 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the aluminum sweat furnace afterburner for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to 1500 degrees Fahrenheit, or the minimum operating temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is below the above mentioned temperature for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.45 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of daily visible emission notations of the sweat furnace afterburner stack exhaust.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the operating temperature for the aluminum sweat furnace afterburner and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (be) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Section D.3

1. The parametric monitoring and associated record keeping requirements for the copper wire reclamation furnace afterburner were removed. The equipment does not meet the applicability for compliance monitoring as outlined in IDEM's May 1996 Compliance Monitoring Guidance.

D.3.4 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the copper wire reclamation furnace afterburner for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to 1500 degrees Fahrenheit, or the minimum operating temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is below the above mentioned temperature for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of daily visible emission notations of the copper wire reclamation furnace afterburner stack exhaust.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain records of the operating temperature for the copper wire reclamation furnace afterburner and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (be) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: OmniSource Corp.

Source Location: 1145 Fairview, Ft. Wayne, Indiana 46803

County: Allen SIC Code: 5093

Operation Permit No.: F003-12494-00057

Permit Reviewer: ERG/DG

The Office of Air Management (OAM) has reviewed a FESOP application from OmniSource Corp. relating to the operation of a process that recovers non-ferrous metal chips from metal alloy chips. **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) aluminum sweat furnace (SF-1) with a maximum capacity of 1200 pounds per hour, consisting of:
 - (1) One (1) melt chamber (maximum heat input rate of 2.0 MMBtu/hr), and
 - (2) One (1) holding chamber (maximum heat input rate of 2.0 MMBtu/hr), connected to an afterburner (maximum heat input rate of 2.0 MMBtu/hr), exhausting to stack SF-1.
- (b) One copper wire reclamation furnace (CF-1) with a maximum capacity of 200 pounds per hour and a maximum heat input rate of 2.5 MMBtu/hr, consisting of:
 - (1) Two (2) primary chambers,
 - (2) One(1) auxiliary burner, and
 - (3) Two (2) afterburners connected to a baghouse and HEPA filter, exhausting to stack CF-1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the approval for the construction and operation of the following equipment:

- (a) One (1) metal alloy chip recycling process line with a maximum feed rate of 6,000 pounds of chips per hour, consisting of the following facilities:
 - (1) One (1) chip crusher controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1.
 - (2) One (1) natural gas-fired rotary dryer (0.6 MMBtu/hr) controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1.
 - (3) One (1) magnet separator,
 - (4) One (1) non-ferrous metal chip separating line controlled by baghouse (CE-3).
 - (5) One (1) ferrous metal chip separating line controlled by baghouse (CE-3).

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 003-9466-00057, issued on July 14, 1998.
- (b) CP 003-2068-00056; issued September 16, 1991.

All conditions from previous approvals were incorporated into this FESOP.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the afterburner on the aluminum sweat furnace be considered as an integral part of the aluminum recovery process:

(a) A previous determination by IDEM (Registration and Construction Operating status permit no. 003-2068-00056) that, because the afterburner is interlocked with the burners in the primary chamber area, the afterburner will be operated at all times when the primary burners are operated.

IDEM, OAM has evaluated the justifications and agreed that the afterburner on the aluminum sweat furnace will be considered as an integral part of the aluminum recovery process. Therefore, the permitting level will be determined using the potential to emit after the aluminum sweat furnace afterburner. Operating conditions in the proposed permit will specify that this afterburner shall operate at all times when the aluminum sweat furnace is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on July 18, 2000. Additional information was received on September 11, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 13).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit before Modification (tons/year)	Potential To Emit of the Modification (tons/year)
PM	13	391
PM-10	13	391
SO ₂	9.2	0.0022
VOC	6.5	526
CO	3.1	0.3
NO _x	5.3	0.4

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit before Modification (tons/year)	Potential To Emit of the Modification (tons/year)
Benzene	<< 1	<< 1
Dichlorobenzene	<< 1	<< 1
Formaldehyde	<< 1	<< 1
Hexane	<< 1	<< 1
Toluene	<< 1	<< 1
Lead	<< 1	<< 1
Cadmium	<< 1	<< 1
Chromium	<< 1	<< 1
Manganese	<< 1	<< 1
Nickel	<< 1	<< 1
TOTAL	<<1	<<1

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and VOC are equal to or greater than 100 tons per year after the modification. Therefore, the source is subject to the provisions of 326 IAC 2-7.

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG

(b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). Through the use of cyclone, the PM and PM10 emissions from the source will be limited to less than 100 tons per year. Through the use of the afterburner, the VOC emissions from the source will be limited to less than 100 tons per year. Therefore, the Title V and PSD requirements are not applicable and the source is in compliance with 326 IAC 6-3.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	СО	NO _X	HAPs
Chip crushing, drying, and separating	38.4	38.4	9.2	22.3	3.4	5.7	<1
Total Emissions	38.4	38.4	9.2	22.3	3.4	5.7	<1

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

OmniSource Corp. Page 5 of 7 Ft. Wayne, Indiana F003-12494-00057

Permit Reviewer: ERG/DG

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emissions units.
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMP(s) as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

326 IAC 2-2 (PSD Rules)

The source is not one of the twenty-eight (28) listed sources and the source will limit PM and VOC emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The source will be in compliance with the limitation by controlling PM and VOC emissions with a cyclone and afterburner, in series. The PM and VOC emissions will be limited as follows:

326 IAC 2-4.1 (New Source Toxics Control)

The potential to emit hazardous air pollutants (HAPs) from this source is less than 10 tons per year for a single HAP and less than 25 tons per year for all HAPs. Therefore, the source is not a major source of HAP, as defined in 40 CFR 63.41. Consequently, the requirements of 326 IAC 2-4.1 (New Source Toxics Control) are not applicable.

326 IAC 2-8-4 (FESOP)

The source will limit PM10 and VOC emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by operating with a maximum chip throughput not to exceed 6,000 pounds per hour with an oil content of 2 percent and controlling PM10 and VOC emissions with a cyclone and afterburner, in series. The PM10 and VOC emissions will be limited as follows:

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9

Permit Reviewer: ERG/DG

or fifteen (15) one (1) minute non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The source will limit VOC emissions from the metal chip dryer to less than 25 tons per year and will render 326 IAC 8-1-6 not applicable.

State Rule Applicability - Metal Alloy Chip Recycling

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the metal chip crushing, drying, and separating processes shall not exceed 8.56 pounds per hour when operating at a process weight of 6,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour

The cyclone and afterburner shall be in operation at all times during the crushing, drying, and separating processes, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The source will limit VOC emissions from the metal chip crusher and dryer to less than 25 tons per year and will render 326 IAC 8-1-6 not applicable.

State Rule Applicability - Aluminum Sweat Furnace

326 IAC 6-3 (Process Operations)

The particulate matter (PM) from the aluminum sweat furnace shall not exceed 2.91 pounds per hour when operating at a process weight of 1200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour

State Applicability - Copper Wire Reclamation Furnace

326 IAC 6-3 (Process Operations)

The particulate matter (PM) from the copper wire reclamation furnace shall not exceed 0.88 pounds per hour when operating at a process weight of 200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG

P = process weight rate in tons per hour

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The source has applicable compliance monitoring conditions as specified below:

- (a) Visible emissions notations of the chip dryer, aluminum sweat furnace, and copper wire reclamation furnace afterburner exhausts shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when abnormal emissions are observed.
- (b) The burner temperature of the chip dryer, aluminum sweat furnace, and copper wire reclamation afterburners shall be recorded at least once per shift. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the burner temperature shall be maintained within the range(s) established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when abnormal temperatures are observed.

These monitoring conditions are necessary because the afterburners must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Emissions Limitations), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of these metal alloy chip recycling and aluminum and copper recover processes shall be subject to the conditions of the attached proposed (FESOP No.: F003-12494-00057).

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG Page 8 of 7 F003-12494-00057

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: OmniSource Corp.

Source Location: 1145 Fairview, Ft. Wayne, Indiana 46803

County: Allen SIC Code: 5093

Operation Permit No.: F003-12494-00057

Permit Reviewer: ERG/DG

The Office of Air Management (OAM) has reviewed a FESOP application from OmniSource Corp. relating to the operation of a process that recovers non-ferrous metal chips from metal alloy chips. **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) aluminum sweat furnace (SF-1) with a maximum capacity of 1200 pounds per hour, consisting of:
 - (1) One (1) melt chamber (maximum heat input rate of 2.0 MMBtu/hr), and
 - (2) One (1) holding chamber (maximum heat input rate of 2.0 MMBtu/hr), connected to an afterburner (maximum heat input rate of 2.0 MMBtu/hr), exhausting to stack SF-1.
- (b) One copper wire reclamation furnace (CF-1) with a maximum capacity of 200 pounds per hour and a maximum heat input rate of 2.5 MMBtu/hr, consisting of:
 - (1) Two (2) primary chambers,
 - (2) One(1) auxiliary burner, and
 - (3) Two (2) afterburners connected to a baghouse and HEPA filter, exhausting to stack CF-1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the approval for the construction and operation of the following equipment:

- (a) One (1) metal alloy chip recycling process line with a maximum feed rate of 6,000 pounds of chips per hour, consisting of the following facilities:
 - (1) One (1) chip crusher controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1.
 - (2) One (1) natural gas-fired rotary dryer (0.6 MMBtu/hr) controlled by a cyclone (CE-1), afterburner (0.25 MMBtu/hr) (CE-2), and baghouse (CE-3), in series, exhausting to stack D-1.
 - (3) One (1) magnet separator,
 - (4) One (1) non-ferrous metal chip separating line controlled by baghouse (CE-3).
 - (5) One (1) ferrous metal chip separating line controlled by baghouse (CE-3).

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 003-9466-00057, issued on July 14, 1998.
- (b) CP 003-2068-00056; issued September 16, 1991.

All conditions from previous approvals were incorporated into this FESOP.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the afterburner on the aluminum sweat furnace be considered as an integral part of the aluminum recovery process:

(a) A previous determination by IDEM (Registration and Construction Operating status permit no. 003-2068-00056) that, because the afterburner is interlocked with the burners in the primary chamber area, the afterburner will be operated at all times when the primary burners are operated.

IDEM, OAM has evaluated the justifications and agreed that the afterburner on the aluminum sweat furnace will be considered as an integral part of the aluminum recovery process. Therefore, the permitting level will be determined using the potential to emit after the aluminum sweat furnace afterburner. Operating conditions in the proposed permit will specify that this afterburner shall operate at all times when the aluminum sweat furnace is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on July 18, 2000. Additional information was received on September 11, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 13).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit before Modification (tons/year)	Potential To Emit of the Modification (tons/year)
PM	13	391
PM-10	13	391
SO ₂	9.2	0.0022
VOC	6.5	526
CO	3.1	0.3
NO _x	5.3	0.4

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit before Modification (tons/year)	Potential To Emit of the Modification (tons/year)
Benzene	<< 1	<< 1
Dichlorobenzene	<< 1	<< 1
Formaldehyde	<< 1	<< 1
Hexane	<< 1	<< 1
Toluene	<< 1	<< 1
Lead	<< 1	<< 1
Cadmium	<< 1	<< 1
Chromium	<< 1	<< 1
Manganese	<< 1	<< 1
Nickel	<< 1	<< 1
TOTAL	<<1	<<1

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and VOC are equal to or greater than 100 tons per year after the modification. Therefore, the source is subject to the provisions of 326 IAC 2-7.

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG

(b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). Through the use of cyclone, the PM and PM10 emissions from the source will be limited to less than 100 tons per year. Through the use of the afterburner, the VOC emissions from the source will be limited to less than 100 tons per year. Therefore, the Title V and PSD requirements are not applicable and the source is in compliance with 326 IAC 6-3.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	СО	NO _X	HAPs
Chip crushing, drying, and separating	38.4	38.4	9.2	22.3	3.4	5.7	<1
Total Emissions	38.4	38.4	9.2	22.3	3.4	5.7	<1

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

OmniSource Corp. Page 5 of 7 Ft. Wayne, Indiana F003-12494-00057

Permit Reviewer: ERG/DG

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emissions units.
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMP(s) as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

326 IAC 2-2 (PSD Rules)

The source is not one of the twenty-eight (28) listed sources and the source will limit PM and VOC emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The source will be in compliance with the limitation by controlling PM and VOC emissions with a cyclone and afterburner, in series. The PM and VOC emissions will be limited as follows:

326 IAC 2-4.1 (New Source Toxics Control)

The potential to emit hazardous air pollutants (HAPs) from this source is less than 10 tons per year for a single HAP and less than 25 tons per year for all HAPs. Therefore, the source is not a major source of HAP, as defined in 40 CFR 63.41. Consequently, the requirements of 326 IAC 2-4.1 (New Source Toxics Control) are not applicable.

326 IAC 2-8-4 (FESOP)

The source will limit PM10 and VOC emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by operating with a maximum chip throughput not to exceed 6,000 pounds per hour with an oil content of 2 percent and controlling PM10 and VOC emissions with a cyclone and afterburner, in series. The PM10 and VOC emissions will be limited as follows:

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9

Permit Reviewer: ERG/DG

or fifteen (15) one (1) minute non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The source will limit VOC emissions from the metal chip dryer to less than 25 tons per year and will render 326 IAC 8-1-6 not applicable.

State Rule Applicability - Metal Alloy Chip Recycling

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the metal chip crushing, drying, and separating processes shall not exceed 8.56 pounds per hour when operating at a process weight of 6,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour

The cyclone and afterburner shall be in operation at all times during the crushing, drying, and separating processes, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The source will limit VOC emissions from the metal chip crusher and dryer to less than 25 tons per year and will render 326 IAC 8-1-6 not applicable.

State Rule Applicability - Aluminum Sweat Furnace

326 IAC 6-3 (Process Operations)

The particulate matter (PM) from the aluminum sweat furnace shall not exceed 2.91 pounds per hour when operating at a process weight of 1200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour

State Applicability - Copper Wire Reclamation Furnace

326 IAC 6-3 (Process Operations)

The particulate matter (PM) from the copper wire reclamation furnace shall not exceed 0.88 pounds per hour when operating at a process weight of 200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG

P = process weight rate in tons per hour

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The source has applicable compliance monitoring conditions as specified below:

- (a) Visible emissions notations of the chip dryer, aluminum sweat furnace, and copper wire reclamation furnace afterburner exhausts shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when abnormal emissions are observed.
- (b) The burner temperature of the chip dryer, aluminum sweat furnace, and copper wire reclamation afterburners shall be recorded at least once per shift. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the burner temperature shall be maintained within the range(s) established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when abnormal temperatures are observed.

These monitoring conditions are necessary because the afterburners must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Emissions Limitations), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of these metal alloy chip recycling and aluminum and copper recover processes shall be subject to the conditions of the attached proposed (FESOP No.: F003-12494-00057).

OmniSource Corp. Ft. Wayne, Indiana Permit Reviewer: ERG/DG Page 8 of 7 F003-12494-00057

Page 1 of 13 TSD App A

Appendix A: Emissions Calculations

Particulate Matter Emissions from Drying Operations

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494 Plt ID: 00057

Reviewer: ERG/DG

Date: 10/10/2000

Total amount collected by baghouse = Percentage of baghouse loading from dryer = Total amount of PM from dryer = Collection eff. of baghouse = Uncontrolled emissions (actual) = Collection eff. of cyclone = Uncontrolled emissions from crusher/dryer = Normal operating rate = Max. operating rate = Uncontrolled emissions (at max op. rate) = Potential operating hours = Actual operating hours = Uncontrolled emissions (potential) =	10.00% 3 97.00% 3.09 90.00% 30.93 4000 6000 46.39 8760	tpy lb/hr lb/hr tpy hrs/yr
Controlled emissions @ 4,000 lb/hr input rate and 2080 hrs/yr = Controlled emissions @ 6,000 lb/hr input rate and 8760 hrs/yr =	0.09 0.59	

Appendix A: Emissions Calculations

VOC from Metal Turning Oils

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057

Reviewer: ERG/DG

Date: 10/10/2000

Afterburner efficiency =	97.00%	
Amount of oil on chips =	2.00%	by wt.
Max. chip throughput =	6000	lb/hr
Weight of oil on chips =	120	lb/hr
Percent VOC of oil (worst case) =	100.00%	
Potential operating hours =	8760	hrs/yr

Potential operating hours = 8760 hrs/ Potential uncontrolled VOC emissions = 525.6 tpy Afterburner reduction eff. = 97.00% Potential controlled VOC emissions = 15.77 tpy

Amount of oil on chips =	2.00% by wt.
Max. chip throughput =	6000 lb/hr
Max amount of oil leaving dryer =	120 lb/hr
Potential operating hours =	8760 hrs/yr
Percent VOC of oil (worst case) =	100.00%
Potential VOC emissions =	525.6 tpy

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100

Chip Crusher/Dryer Afterburner

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

Heat Input Capacity Potential Throughput

MMBtu/hr MMCF/yr

0.25

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	8.32E-03	8.32E-03	6.57E-04	1.10E-01	6.02E-03	9.20E-02

^{*}PM and PM10 emission factors are combined filterable and condensable PM and PM10, respectively.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) \times 8,760 hrs/yr \times 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

^{**}Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations Natural Gas Combustion Only

MM BTU/HR <100

Chip Crusher/Dryer Afterburner

HAPs Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057

Reviewer: ERG/DG

Date: 10/10/2000

HAPs - Organics

		in ii o oigainee			
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.300E-06	1.314E-06	8.213E-05	1.971E-03	3.723E-06

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.475E-07	1.205E-06	1.533E-06	4.161E-07	2.300E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100

Chip Dryer

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

Heat Input Capacity Potential Throughput

MMBtu/hr MMCF/yr

0.6

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	4.99E-03	2.00E-02	1.58E-03	2.63E-01	1.45E-02	2.21E-01

^{*}PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) \times 8,760 hrs/yr \times 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

gasc99.wk4 9/95 updated 4/99

^{**}Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations Natural Gas Combustion Only

MM BTU/HR <100

Chip Dryer

HAPs Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.519E-06	3.154E-06	1.971E-04	4.730E-03	8.935E-06

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.314E-06	2.891E-06	3.679E-06	9.986E-07	5.519E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100

Chip Dryer

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

Heat Input Capacity Potential Throughput

MMBtu/hr MMCF/yr

0.6

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	4.99E-03	2.00E-02	1.58E-03	2.63E-01	1.45E-02	2.21E-01

^{*}PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) \times 8,760 hrs/yr \times 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

gasc99.wk4 9/95 updated 4/99

^{**}Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations Natural Gas Combustion Only

MM BTU/HR <100

Chip Dryer

HAPs Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.519E-06	3.154E-06	1.971E-04	4.730E-03	8.935E-06

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.314E-06	2.891E-06	3.679E-06	9.986E-07	5.519E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations Sweat Furnace Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

THROUGHPUT lbs/hr 1200 THROUGHPUT ton/yr 5256

		POLLUTANT					
	PM	PM10	SO2	CO	VOC	NOX	
Emission Factor in lb/ton	4.67	4.67	3.50	0.00	2.40	0.60	
Potential Emissions in ton/yr	12.3	12.3	9.2	0.0	6.3	1.6	

Methodology

Emission factors are from AIRS-EPA 450/4-90-003. SCC #30400101.

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Potential emissions in tons/yr = (thruput, lb/hr)*(emission factor, lb/ton)*(8760 hrs/yr)

PM and PM10 emission factors are provided by the source based on their best engineering knowledge and practice.

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100

Aluminum Sweat Furnace

Melt Chamber, Holding Chamber, and Afterburner

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057

Reviewer: ERG/DG

Date: 10/10/2000

Heat Input Capacity Potential Throughput

MMBtu/hr MMCF/yr

6.0 52.6

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	0.2	0.02	2.63	0.1	2.2

^{*}PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

^{**}Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations Natural Gas Combustion Only

MM BTU/HR <100

Aluminum Sweat Furnace Melt Chamber, Holding Chamber, and Afterburner

HAPs Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.519E-05	3.154E-05	1.971E-03	4.730E-02	8.935E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.314E-05	2.891E-05	3.679E-05	9.986E-06	5.519E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Page 10 of 13 TSD App A

Particulate Matter Emissions from Non-ferrous and Ferrous Lines

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057

Reviewer: ERG/DG

Date: 10/10/2000

Total amount collected by baghouse =	30	tpy
Percentage of baghouse loading from non-ferrous and ferrous lines Total amount of PM from non-ferrous and ferrous lines = Collection eff. of baghouse = Uncontrolled emissions from	90.00% 27 97.00%	tpy
non-ferrous and ferrous lines (actual) = Non-ferrous line production rate = Ferrous line production rate =	27.84 3400.00 600.00	lb/hr
non-ferrous line (actual) = (actual) =	23.66 4.18	tpy tpy
Normal source operating rate = Max. source operating rate = non-ferrous line (max source rate) =	4000 6000 35.49	lb/hr
(max source rate) = Actual operating hours =		hrs/yr
Potential operating hours = Capture efficiency of line hoods = non-ferrous line (max source rate, max	90.00%	hrs/yr
op. hours) = Uncontrolled emissions from ferrous line	166.07	
(max source rate, max op. hours) = Controlled emissions from non-ferrous	29.31	tpy
line (max source rate, max op. hours) = Ccontrolled emissions from ferrous line	21.09	tpy
(max source rate, max op. hours) =	3.72	tpy

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100

Copper Wire Reclamation Furnace

2 Primary Chambers, 1 Auxiliary Burner, and 2 Afterburners

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057

Reviewer: ERG/DG

Date: 10/10/2000

Heat Input Capacity Potential Throughput

MMBtu/hr MMCF/yr

2.5

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	8.32E-02	8.32E-02	6.57E-03	1.10E+00	6.02E-02	9.20E-01

^{*}PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

^{**}Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included). See page 2 for HAPs emissions calculations.

gasc99.wk4 9/95 updated 4/99

Page 12 of 13 TSD App A

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Copper Wire Reclamation Furnace - Natural Gas
Combustion

2 Primary Chambers, 1 Auxiliary Burner, and 2 Afterburners

HAPs Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenze ne 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.300E-05	1.314E-05	8.213E-04	1.971E-02	3.723E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.475E-06	1.205E-05	1.533E-05	4.161E-06	2.300E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations Page 13 of 13 TSD App A

Copper Wire Reclamation Furnace Particulate Matter Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

		POLLUTANT	
	PM	PM10	Lead Oxide
Emission Factor in lb/hr	0.085	0.085	0.007
Potential Emissions in ton/yr	0.37	0.37	3.07E-02

Methodology

Emission factors based on stack testing of identical unit.

Potential emissions in tons/yr = (emission factor, lb/hr)*(8760 hrs/yr)

Appendix A: Emission Calculations Page 13 of 13 TSD App A

Copper Wire Reclamation Furnace Particulate Matter Emissions

Company Name: OmniSource

Address City IN Zip: 1145 Fairview. Ft. Wayne, IN 46803

CP: 003-12494

Plt ID: 00057 Reviewer: ERG/DG

Date: 10/10/2000

		POLLUTANT	
	PM	PM10	Lead Oxide
Emission Factor in lb/hr	0.085	0.085	0.007
Potential Emissions in ton/yr	0.37	0.37	3.07E-02

Methodology

Emission factors based on stack testing of identical unit.

Potential emissions in tons/yr = (emission factor, lb/hr)*(8760 hrs/yr)